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September 18, 2019

VIA ECF

The Honorable Lorna G. Schofield
United States District Court
Southern District of New York
500 Pearl Street, Room 640
New York, New York

Re: ***Tibor Kiss v. Clinton Green North, LLC, et al.***
Docket No.: 17-cv-10029 (LGS)

Dear Judge Schofield:

We represent defendant/third-party defendant Judy Painting Corp. ("Judy") in the above-referenced matter. We are writing in response to the Court's Order dated September 11, 2019. The parties are currently conferring as to the selection of the Court-appointed mediator and we respectfully request that the time for the parties to agree on a mediator be extended to October 15, 2019. In addition, we also respectfully request that the time for the parties to complete mediation be extended an additional thirty (30) to forty-five (45) days after selecting a mediator in order to provide enough time for Judy's insurance carrier to obtain settlement authority so that a meaningful mediation can ensue. All parties have consented to an extension of time to complete the mediation.

Moreover, pursuant to the case management conference held on August 29, 2019, we respectfully request that all expert discovery be stayed pending the completion of the mediation.

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Very truly yours,

WOOD, SMITH, HENNING & BERMAN LLP

By: /s/ Bolam Kim
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